

REMARKS

Reconsideration of the present application is respectfully requested. Claims 21-42, 44-61, and 63-70 were pending. Claims 21-27, 29, 30, 34, 35, 40, 42, 49, 51-54, 67, and 70 have been amended without adding any new matter. No claims have been added or cancelled. Thus, claims 21-42, 44-61, and 63-70 remain pending.

The Applicants thank the Examiner for the courtesy of a telephone call on January 23, 2007. The Applicants have made Amendments to impart precision to the claims and capture what the Applicants regard as the invention of the embodied in the pending application. Although the Examiner could not assure the Applicants that an amendment regarding onboard message routing would overcome the Cortjens reference, the Applicants have more precisely claimed local message routing onboard client and local media capture devices, and submit that the presently amended claims overcome Cortjens.

The Examiner rejected claims 21-27, 29-39, 41-53, 55-58, and 60-70 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 5,526,037 of Cortjens et al. (hereinafter "Cortjens").

Cortjens describes a system and method where a central controller has device-specific software that it transfers to network converters that provide support for peripheral devices (Cortjens, column 2, line 56 to column 3, line 15). As described in Cortjens, when a peripheral device generates a signal (i.e., mouse movement) intended to control a remote camera, the signal is translated to a network standard control signal by a network converter (column 2, line 50 to column 3, line 15; Figure 1, elements 11, 12, 13, and 18). The network converter communicates the standard control signal to a standard signal specific to the remote camera, in order to carry out the action of the

peripheral device (column 6, lines 20-46; Figures 5A and 5B). A network converter, to which the camera has been connected, then translates the standard signal to the actual device specific signal to control the remote camera (Cortjens, column 3, lines 16-23; column 5, lines 55-59). In order to ensure that a remote camera performs the desired operation, a position indicator reports current pan and tilt positions back to the controller after each operation is completed, so that the controller can compare the action specified by the peripheral device with the result. In the event that an error has occurred, the controller takes various actions (column 8, line 57 to column 9, line 20).

With respect to amended claim 21, the Applicants claim:

A media capture device system allowing a user interface of a media capture device to be supported at least in part by a second device, the system comprising:

a module for generating at least one high-level event message indicating that an event has occurred that is relevant to the media capture device;

a router on-board the media capture device for determining whether said at least one high-level event message is handled locally at the media capture device or remotely at the second device;

a mapper on-board the media capture device for mapping said at least one high-level message into at least one lower-level message for controlling one or more hardware elements controlled by the second device; and

a module for communicating said at least one lower-level message to the second device, such that the second device may activate one or more hardware elements that are appropriate for said event that has occurred.

The Applicants respectfully submit that Cortjens fails to describe each and every feature as claimed in claim 21. Cortjens describes distinct devices with well defined functionality, in which the devices are merely connected over a network. While controllers perform basic signal routing and error-reporting functions, controllers are not media capture devices of any kind. Rather, controllers merely connect and provide

signal translation functions to the various components of the system of Cortjens, such as peripheral devices and remote cameras. Furthermore, although Cortjens describes a remote camera, the remote camera merely responds to control signals and reports pan/tilt coordinates, without itself performing any signal routing, error-reporting, signal translation, etc. Thus, the system of Cortjens fails to describe or suggest “a router on-board the media capture device for determining whether said at least one high-level event message is handled locally at the media capture device or remotely at the second device; a mapper on-board the media capture device for mapping said at least one high-level message into at least one lower-level message for controlling one or more hardware elements controlled by the second device.” Therefore, Cortjens fails to describe each and every feature as claimed by the Applicants in Claim 21.

The Applicants respectfully submit that claim 21 is not anticipated by Cortjens. Claims 22-27, 29-39, 41-50 depend on claim 21, and include additional features and limitations to those contained in claim 1. Thus, for similar reasons to those discussed above with respect to claim 1, claims 22-27, 29-39, 41-50 are also not anticipated by Cortjens. The Applicants respectfully request withdrawal of the rejections of claim 21-27, 29-39, 41-50 under § 102.

Similarly, amended claim 51 recites:

An interface system allowing a client device to be partially supported by a host device, the system comprising:

an onboard interface engine on the client device for generating at least one high-level event message indicating that an event has occurred on the client device;

a router in the client device to determine whether the at least one high level event message should be handled locally at the client device or remotely at the host;

a state transition table to transition the client device to a new state based on the at least one high level event and the client device's present

state;
a module to update the client device's current state information;
and
a mapper for mapping said at least one high-level message into at least one lower-level message for controlling one or more hardware elements controlled by the host device.

As discussed above, with respect to claim 21, Cortjens describes distinct devices, such as peripheral devices, remote cameras, network converters, and controllers, which are connected to one another over a network. Routing and error reporting functionality resides in network controllers, which acts as a host to the network converters and various peripheral devices of Cortjens. Because claim 51 claims “a router in the client device to determine whether the at least one high level event message should be handled locally at the client device or remotely at the host,” claim 51 is similarly not anticipated by Cortjens. Additionally, the client device of claim 51 includes “a state transition table to transition the client device to a new state based on the at least one high level event and the client device’s present state; [and] a module to update the client device’s current state information.” Although Cortjens mentions software for device specific signal translation, Cortjens is completely silent as to whether any device includes a state transition table and a module for updating the state transition table. Furthermore, claims 52, 53, 55-58, and 60-66 depend on claim 51, and include additional features and limitations. Thus, claims 52, 53, 55-58, and 60-66 are also not anticipated by Cortjens.

Claim 67, as amended, recites:

A method comprising:
receiving a notification at a media capture device, indicating that an event has occurred with respect to the media capture device;
determining, at a router on-board the media capture device,
whether the event should be handled locally at the media capture device

or remotely at a second device;
when the event is to be handled locally, processing the event
locally at the media capture device;
transmitting a message to the second device, intended to activate a
hardware element on the second device;
activating a hardware element on the second device, in response to
the message.

As discussed above, with respect to claim 21, Cortjens describes network controllers that perform routing and reporting functions over a network, but which are not media capture devices. Furthermore, Cortjens describes cameras which merely respond to control signals and report the results of operations performed by the camera, and thus the camera fails to perform functions of the network controllers. Thus, similar to the discussion above with respect to claim 21, Cortjens fails to teach or suggest “determining, at a router on-board the media capture device, whether the event should be handled locally at the media capture device or remotely at a second device,” as claimed in claim 67. Therefore, Cortjens fails to anticipate claim 67. Claims 68-70 depend on claim 67, and include additional features and limitations. Thus, claims 68-70 are also not anticipated by Cortjens.

Claims 40 and 59 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cortjens in view of U.S. Patent No. 6,930,709 of Creamer et al. (hereinafter “Creamer”). The Applicants respectfully disagree and submit that Cortjens and Creamer, alone or in combination, fail to teach or suggest each and every element as claimed by the applicants in claims 40 and 59. As discussed above, with respect to independent claims 21 and 51, Cortjens fails to describe or suggest a router on-board a media capture device, or a client device, for determining if an action can be handled locally. Creamer describes a self-contained camera that can upload images or video

directly to the internet based on user commands entered into the camera (Creamer, column 6, lines 29-58). Although Creamer describes the user-directed transmission of images or video, Creamer also fails to describe or suggest a router on-board a media capture device, or a client device, for determining if an action can be handled locally, as recited in claims 21 and 51. Therefore, Cortjens and Creamer, alone or in combination, fail to render claims 21 and 51, and thus dependent claims 40 and 59, obvious.


Claims 28 and 54 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Cortjens in view of U.S. Patent No. 5,606,365 of Maurinus et al. (hereinafter "Maurinus"). The Applicants respectfully disagree and submit that Cortjens and Maurinus, alone or in combination, fail to teach or suggest each and every element as claimed by the applicants in claims 28 and 54. As discussed above, with respect to independent claims 21 and 51, Cortjens fails to describe or suggest a router on-board a media capture device, or a client device, for determining if an action can be handled locally. Maurinus merely describes a camera which wirelessly transmits raw image data to a separate image processing application before transmitting the image to a home interface controller (Maurinus, column 8, lines 39-51; column 2, line 60 to column 3, line 19). However, Maurinus's transmitting image data to one process and then transmitting image data to a another process fails to describe or suggest a router on-board a media capture device, or a client device, for determining if an action can be handled locally, as recited in claims 21 and 51. Therefore, Cortjens and Maurinus, alone or in combination, fail to render claims 21 and 51, and thus dependent claims 28 and 54, obvious.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit
account no. 02-2666.

Respectfully submitted,
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